

Peter M. Meloy, MT Bar No. 1035
MELOY LAW FIRM
P.O. Box 1241
Helena, Montana 59624
Tel: (406) 442-8670
mike@meloylawfirm.com

Abha Khanna, *pro hac vice forthcoming*
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Tel: (206) 359-8000
akhanna@perkinscoie.com

*Attorneys for Proposed Intervenor-
Defendants DSCC, DCCC, and Montana
Democratic Party*

UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
HELENA DIVISION

DONALD J. TRUMP FOR
PRESIDENT, INC.; REPUBLICAN
NATIONAL COMMITTEE;
NATIONAL REPUBLICAN
SENATORIAL COMMITTEE;
MONTANA REPUBLICAN STATE
CENTRAL COMMITTEE,

Plaintiffs,

v.

STEPHEN BULLOCK, in his official
capacity as Governor of Montana;
COREY STAPLETON, in his official
capacity as Secretary of State of
Montana,

Case No.: 6:20-cv-00066-DLC

**MOTION TO INTERVENE AS
DEFENDANTS**

EXPEDITED BRIEFING
SCHEDULE REQUESTED

Defendants,
and
DSCC, DCCC, and MONTANA
DEMOCRATIC PARTY,
Proposed
Intervenor-
Defendants.

MOTION

Pursuant to Federal Rule of Civil Procedure 24 and Local Rule 24.1, Proposed Intervenor-Defendants DSCC, DCCC, and Montana Democratic Party (collectively, “Proposed Intervenor”) move to intervene as defendants in the above-titled action. Proposed Intervenor respectfully request that this Court enter an order setting an expedited briefing schedule to resolve this Motion and allow Proposed Intervenor to file a response to Plaintiffs’ Motion for Preliminary Injunction, for which Plaintiffs are seeking responses by September 10, 2020. *See* ECF No. 16. This Motion is supported by Proposed Intervenor’s Brief in Support of Motion to Intervene as Defendants and Proposed Answer.

Proposed Intervenor seek intervention to oppose Plaintiffs’ Complaint for Declaratory and Injunctive Relief and Motion for Preliminary Injunction, which attempt to undo Defendant Stephen Bullock’s directive to permit counties to implement mail voting for the November 3, 2020 general election. In so doing,

Plaintiffs seek to undermine the State's efforts to protect Montana voters during an unprecedented public health crisis. Intervention is needed to protect Proposed Intervenor's substantial and distinct legal interests, which will otherwise be inadequately represented by the parties in this litigation.

Pursuant to Local Rule 7.1(c)(1), counsel for Proposed Intervenor has conferred with counsel for Plaintiffs Donald J. Trump for President, Inc., Republican National Committee, National Republican Senatorial Committee, and Montana Republican State Central Committee, and Plaintiffs have not provided Proposed Intervenor with a response regarding this Motion. Counsel for Proposed Intervenor has also conferred with counsel for Defendant Stephen Bullock, who has consented to this Motion. Defendant Corey Stapleton has yet to appear in this action.

Proposed Intervenor believe that expeditious consideration of this motion would serve judicial efficiency and ensure that they are able to protect their rights and interests. Accordingly, Proposed Intervenor respectfully request the following briefing schedule:

- Responses to Proposed Intervenor's Motion to Intervene as Defendants shall be filed on or before Tuesday, September 8, 2020; and
- Proposed Intervenor's reply briefs, if any, shall be filed on or before Thursday, September 9, 2020.

DATED this 4th day of September, 2020

By: 

Peter M. Meloy
MELOY LAW FIRM
P.O. Box 1241
Helena, Montana 59624
Tel: (406) 442-8670
mike@meloylawfirm.com

Abha Khanna*
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Tel: (206) 359-8000
akhanna@perkinscoie.com

*Attorneys for Proposed Intervenor-
Defendants DSCC, DCCC, and Montana
Democratic Party*

**Pro hac vice application forthcoming*